

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Taylor Robinson

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECOM is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>KERR MCGEE OIL & GAS ONSHORE LP</u>	Operator No: <u>47120</u>	Phone Numbers Phone: <u>(720) 929-4306</u> Mobile: <u>()</u>
Address: <u>P O BOX 173779</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80217-3779</u>
Contact Person: <u>Erik Mickelson</u>	Email: <u>DJRemediation_Forms@oxy.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 40801 Initial Form 27 Document #: 404191427

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>490103</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Mills 15-26/Skelly 9 Tank Battery</u>		Latitude: <u>40.191844</u>	Longitude: <u>-104.736585</u>
490103		** correct Lat/Long if needed: Latitude: _____ Longitude: _____	
QtrQtr: <u>SESE</u>	Sec: <u>26</u>	Twps: <u>3N</u>	Range: <u>66W</u> Meridian: <u>6</u> Sensitive Area? <input type="checkbox"/> Yes

SITE CONDITIONS

General soil type - USCS Classifications SM Most Sensitive Adjacent Land Use Surface Water
Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes
Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

West Spear Canal 700 feet (ft) west. An area with wetland characteristics are located approximately 700 ft west. County Road 1,060 ft south.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	TBD	Groundwater Samples/Laboratory Analytical Results
Yes	SOILS	TBD	Soil Samples/Laboratory Analytical Results

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Decommissioning activities were completed at the Mills 15-26, Skelly 9 facility on July 18, 2025. Groundwater was not encountered during decommissioning activities. Visual inspection and field screening of soil at three aboveground storage tanks (ASTs), one produced water vessel (PWV), two separators, two meter house locations, three dumphole pothole locations, and one emission control device (ECD) were conducted following removal activities. Soil samples (AST01@0.5', AST02@0.5', AST03@0.5', PWV-B01@5', PWV-S01@2', SEP01-INLET@4', SEP01-OUTLET@4', SEP02-INLET@4', and SEP02-OUTLET@4') were submitted for analysis of full list Table 915-1 constituents to determine if a release occurred. Initial laboratory analytical results indicated pH below the Table 915-1 allowable level and background level were present at the PWV-S01 and AST 01 locations. Verification samples were collected concurrently with the initial samples, but in separate laboratory provided bottles to confirm the initial results. Final analytical results confirmed that pH below the Table 915-1 allowable level are present at the PWV-S01 and AST 01 locations. As such, a Form 19 Initial/Supplemental Spill/Release Report (Document No. 404302677) was submitted on August 1, 2025, and the Spill/Release Point ID is pending. The facility soil sample locations are depicted on Figure 1. The PID readings and soil sample results are summarized in Tables 1 and 2, respectively.

Assessment activities are pending and details will be provided in a subsequent Form 27 supplemental report.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

On July 18, 2025, soil samples were collected from the ASTs, PWV, and separators at depths ranging from 0.5 ft below ground surface (bgs) and 5 ft bgs. The samples were submitted for analysis of full list Table 915-1 constituents, using ECMC approved methods. Initial laboratory analytical results indicated pH below the Table 915-1 allowable level and background level were present at the PWV-S01 and AST 01 locations. Verification samples were collected concurrently with the initial samples, but in separate laboratory provided bottles to confirm the initial results. Final analytical results confirmed that pH below the Table 915-1 allowable level are present at the PWV-S01 and AST 01 locations. The laboratory report is attached.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Groundwater was not encountered during facility decommissioning activities.

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

On July 18, 2025, visual inspection and field screening of soil were conducted at footprint, drain, and/or hatch of each AST, three sidewall locations within the PWV excavation, two meter house locations, three dumphole potholes, and the ECD. Based on the inspection and screening results, hydrocarbon-impacted soil was not observed at the screening locations, and no soil samples were submitted for laboratory analysis from these areas, in accordance with the ECMC Operator Guidance. A photographic log is attached.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 18

Number of soil samples exceeding 915-1 12

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 312

NA / ND

-- Highest concentration of TPH (mg/kg) 338

-- Highest concentration of SAR 0.667

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 5

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet) _____

Number of groundwater monitoring wells installed _____

Number of groundwater samples exceeding 915-1 _____

_____ Highest concentration of Benzene (µg/l) _____

_____ Highest concentration of Toluene (µg/l) _____

_____ Highest concentration of Ethylbenzene (µg/l) _____

_____ Highest concentration of Xylene (µg/l) _____

_____ Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected

_____ Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

One tank battery background soil sample (TB-BG01@0.5') was collected from the soil used to construct the tank battery. Eighteen background samples were also collected as part of the Camp 37-26 wellhead and HSR-Showalter 16-26A, Camp 37,39-26 flowlines removal activities (Remediation No. 36582 and 40719), located approximately 413 ft southwest, from similar depths (3' and 6' bgs), and field observed soil type (Clayey Sand). The background soil samples were submitted for laboratory analysis of pH, electrical conductivity (EC), sodium adsorption ratio (SAR), boron, and Table 915-1 metals, using ECOMC-approved methods. Analytical results indicate that pH is naturally low and arsenic is naturally high in the tank battery and EC, SAR, pH, arsenic, barium, cadmium, hexavalent chromium, lead, and selenium are naturally high in the native soil. The background soil sample analytical results are summarized in Table 2. The background soil sample locations are illustrated on Figures 1 and 2.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____

Volume of liquid waste (barrels) _____

Is further site investigation required?

Assessment activities are pending and details will be provided in a subsequent Form 27 supplemental report.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Impacted soil from the facility decommissioning activities will be removed and transported to a licensed disposal facility. Final disposal information will be provided upon completion of assessment activities. Disposal records will be kept on file and available upon request. The excavation areas will be backfilled and contoured to match pre-existing conditions.

REMEDICATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Laboratory data indicate that pH below the ECMC Table 915-1 allowable level and background level remain in the PWV-S01 and AST01 locations. Groundwater was not encountered during facility decommissioning activities. Assessment activities are pending and details will be provided in a subsequent Form 27 supplemental report.

Soil Remediation Summary

In Situ

Ex Situ

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

- _____ Excavate and offsite disposal
- _____ If Yes: Estimated Volume (Cubic Yards) _____
- _____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
- _____ Excavate and onsite remediation
- _____ Land Treatment
- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Other _____

Groundwater Remediation Summary

- _____ Bioremediation (or enhanced bioremediation)
- _____ Chemical oxidation
- _____ Air sparge / Soil vapor extraction
- _____ Natural Attenuation
- _____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The site will be reclaimed in accordance with ECMC 1000 Series Reclamation Rules.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim

Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 08/01/2025

Actual Spill or Release date, or date of discovery. 07/31/2025

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 07/18/2025

Proposed site investigation commencement. 07/18/2025

Proposed completion of site investigation. 02/23/2026

REMEDIAL ACTION DATES

Proposed start date of Remediation. 07/18/2025

Proposed date of completion of Remediation. 02/23/2026

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

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I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Erik Mickelson

Title: Environmental Lead

Submit Date: 08/26/2025

Email: DJRemediation_Forms@oxy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Taylor Robinson

Date: 02/06/2026

Remediation Project Number: 40801

COA Type**Description**

	Background samples NATIVE-BG10@3',6'(Rem No.40719), Native-BG04@3',6'(Rem No.36582), NATIVE-BG06@3',6'(Rem No.40719), NATIVE-BG07@3',6'(Rem No.40719), and Native-BG01@3',6'(Rem No.36582)were collected from areas on-location and are therefore not representative of native background conditions. These samples shall be omitted from future background determination calculations.
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1 COA

ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num**Name**

404307337	INVESTIGATION/REMEDICATION WORKPLAN (SUPPLEMENTAL)
404310693	LABORATORY ANALYTICAL REPORT
404324305	SOIL SAMPLE LOCATION MAP
404324306	SOIL SAMPLE LOCATION MAP
404324308	ANALYTICAL DATA SUMMARY TABLE(S)
404324309	PHOTO DOCUMENTATION
404536679	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 7 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)